

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Trustee-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the  
Substantively Consolidated SIPA Liquidation  
of Bernard L. Madoff Investment Securities  
LLC and the Estate of Bernard L. Madoff,

Plaintiff,

v.

NATIXIS, NATIXIS CORPORATE &  
INVESTMENT BANK (f/k/a IXIS  
CORPORATE & INVESTMENT BANK),  
NATIXIS FINANCIAL PRODUCTS, INC.,  
BLOOM ASSET HOLDINGS FUND, and  
TENSYS LIMITED,

Defendants.

Adv. Pro. No. 10-05353 (SMB)

**STIPULATION AND ORDER EXTENDING TIME TO RESPOND  
AND ADJOURNING THE PRE-TRIAL CONFERENCE**

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein,  
that the time by which the Trustee may respond to the Motion to Dismiss filed by Defendant  
Natixis Financial Products LLC (as successor in interest to Natixis Financial Products Inc.)  
("Natixis FP") is extended up to and including June 8, 2018. It is further stipulated and agreed

that Natixis FP shall file its reply by August 31, 2018. The pre-trial conference was scheduled for June 27, 2018, but will now be scheduled for October 31, 2018 at 10:00 a.m. The return date for this matter was scheduled for May 30, 2018, but will now be scheduled for September 26, 2018 at 10:00 a.m.

The extension of time granted by this stipulated extension (the “Stipulation”) is without prejudice to any future extensions of time.

Except as expressly set forth herein, the parties to this Stipulation reserve all rights and defenses the Trustee and Natixis FP may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original.

*[Remainder of page intentionally left blank.]*

Dated: March 7, 2018  
New York, New York

BAKER & HOSTETLER LLP

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the Substantively Consolidated SIPA  
Liquidation of Bernard L. Madoff  
Investment Securities LLC and the estate  
of Bernard L. Madoff*

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*Attorneys for Defendant Natixis Financial  
Products LLC (as successor in interest to  
Natixis Financial Products Inc.)*

SO ORDERED this 8th day of March, 2018.

/s/ Stuart M. Bernstein  
HON. STUART M. BERNSTEIN  
UNITED STATES BANKRUPTCY JUDGE